

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 22-13069-AMC
Joseph Orfanelli, Jr.	: Chapter 13
Debtor	:
	:
U.S. Bank National Association, not in its	:
individual capacity but solely as trustee for the	:
RMTP Trust, Series 2019-C c/o Rushmore	:
Servicing	:
Movant	:
vs.	:
Joseph Orfanelli, Jr.	:
Debtor/Respondent	:
and	:
Scott F. Waterman, Esquire	:
Trustee/Respondent	:

CERTIFICATION OF DEFAULT

AND NOW, comes secured Creditor, U.S. Bank National Association, not in its individual capacity but solely as trustee for the RMTP Trust, Series 2019-C c/o Rushmore Servicing (“Movant”) by and through its counsel, Hladik, Onorato & Federman, LLP, and files this Certification of Default to obtain an order for Relief from the Automatic Stay due to Debtor’s failure to comply with the terms of the Stipulation resolving a Motion for Relief from Stay, and avers the following:

1. On November 20, 2023, the attached Stipulation was approved by the Court. See Exhibit “A” attached.
2. Debtor did not continue to make the post-petition payments as required by the Stipulation. On February 26, 2024, Movant sent a Notice of Default to the Debtor and Debtor’s Counsel, Brad J. Sadek, Esquire, as required by paragraph 5 of the Stipulation. See Exhibit “B” attached.
3. Per the terms of the Stipulation if the default is not cured within ten (10) days of the date of the written notice of default, Movant may file a Certification of Default and an Order shall be entered granting Movant relief from the stay.
4. As of the date of the filing of this Certification of Default, more than ten (10) days have passed and the default has not been cured. Movant has not received the following payments:

January 1, 2024 at \$851.27.....	\$851.27
February 1, 2024 through April 1, 2024 at \$889.81/each.....	\$2,669.43
Attorney fees for Notice of Default.....	\$100.00
Attorney fees for Certification of Default.....	\$200.00
Suspense Balance.....	(\$97.46)
 TOTAL	 \$3,723.24

WHEREFORE, Movant respectfully requests this Honorable Court ORDER that Movant be granted Relief from the Automatic Stay.

Respectfully Submitted:

/s / Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
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